

AUSA: Ryan Finkel

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**24 MAG 351**

UNITED STATES OF AMERICA

v.

RUI-SIANG LIN,  
a/k/a “林睿庠,”

Defendant.

**SEALED COMPLAINT**

Violations of 18 U.S.C. §§ 371, 1956, and  
2; and 21 U.S.C. §§ 846, 848

COUNTY OF OFFENSE:  
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

Mark Rubins, being duly sworn, deposes and says that he is a Task Force Officer with the Federal Bureau of Investigation (“FBI”), and charges as follows:

**COUNT ONE**  
**(Continuing Criminal Enterprise)**

1. From at least in or about October 2020, up to and including on or about the date of the filing of this Complaint, in the Southern District of New York, and elsewhere, RUI-SIANG LIN, a/k/a “林睿庠,” the defendant, engaged in a continuing criminal enterprise (the “Continuing Criminal Enterprise”), in that LIN knowingly and intentionally participated in a continuing series of violations of Title 21, United States Code, Chapter 13, Subchapters I and II, including, among others, Violations One through Four set forth below, undertaken by LIN in concert with at least five other persons with respect to whom LIN occupied a position of principal administrator, organizer, a supervisory position, and leader of the Continuing Criminal Enterprise, and (a) from which continuing series of violations LIN and the Continuing Criminal Enterprise obtained substantial income and resources, in excess of \$10 million and more in gross receipts during a 12-month period of its existence for the manufacture, importation, and distribution of cocaine, heroin, LSD, and methamphetamine; and (b) which continuing series of violations involved at least 300 times the quantity of mixtures and substances containing a detectable amount of cocaine, lysergic acid diethylamide (“LSD”), and methamphetamine, its salts, isomers, or salts of its isomers, described in Title 21, United States Code, Section 841(b)(1)(B).

**Violation One**

2. From at least in or about October 2020, up to and including on or about the date of the filing of this Complaint, in the Southern District of New York, and elsewhere, RUI-SIANG LIN, a/k/a “林睿庠,” the defendant, and others known and unknown, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to distribute and possess with intent to distribute were (i) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A); (ii) one kilogram and more of mixtures and substances containing a detectable

amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A); (iii) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A); (iv) 10 grams and more of mixtures and substances containing a detectable amount of lysergic acid diethylamide (LSD), in violation of Title 21, United States Code, Section 841(b)(1)(A); (v) 100 kilograms or more of a mixture or substance containing a detectable amount of marihuana in violation of Title 21, United States Code, Section 841(b)(1)(B); (vi) mixtures and substances containing a detectable amount of Oxycodone, in violation of Title 21, United States Code, Section 841(b)(1)(C); (vii) mixtures and substances containing a detectable amount of ketamine, in violation of Title 21, United States Code, Section 841(b)(1)(C); (viii) mixtures and substances containing a detectable amount of Methylenedioxymethamphetamine ("MDMA"), in violation of Title 21, United States Code, Section 841(b)(1)(C); (ix) mixtures and substances containing a detectable amount of amphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(C); (x) mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C), and 846.

#### Violation Two

3. From at least in or about October 2020, up to and including on or about the date of the filing of this Complaint, in the Southern District of New York, and elsewhere, RUI-SIANG LIN, a/k/a "林睿庠," the defendant, and others known and unknown, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to (i) import a controlled substance into the United States and into the customs territory of the United States from a place outside thereof, (ii) manufacture, distribute, and possess with intent to distribute a controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, which controlled substances were mixtures and substances containing a detectable amount of heroin, cocaine, methamphetamine, Methylenedioxymethamphetamine ("MDMA"), and LSD in violation of Title 21, United States Code, Sections 952(a), 959(a), 960(a)(1), 960(a)(3), 960(b)(3), and 963.

#### Violation Three

4. On or about February 7, 2023, in the Southern District of New York, and elsewhere, RUI-SIANG LIN, a/k/a "林睿庠," the defendant, knowingly and intentionally distributed and possessed with intent to distribute a controlled substance, to wit, mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

#### Violation Four

5. From at least in or about October 2020, up to and including on or about the date of the filing of this Complaint, in the Southern District of New York, and elsewhere, RUI-SIANG LIN, a/k/a "林睿庠," the defendant, delivered, distributed, and dispensed controlled substances by means of the Internet, in a manner not authorized by law, and aided and abetted such activity, in violation of Title 21, United States Code, Sections 841(h), and Title 18, United States Code, Section 2.

6. The controlled substances that RUI-SIANG LIN, a/k/a “林睿庠,” the defendant, delivered, distributed, and dispensed by mean of the Internet, were (i) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A); (ii) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A); (iii) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A); (iv) 10 grams and more of mixtures and substances containing a detectable amount of lysergic acid diethylamide (LSD), in violation of Title 21, United States Code, Section 841(b)(1)(A); (v) 100 kilograms or more of a mixture or substance containing a detectable amount of marihuana in violation of Title 21, United States Code, Section 841(b)(1)(B); (vi) mixtures and substances containing a detectable amount of Oxycodone, in violation of Title 21, United States Code, Section 841(b)(1)(C); (vii) mixtures and substances containing a detectable amount of ketamine, in violation of Title 21, United States Code, Section 841(b)(1)(C); (viii) mixtures and substances containing a detectable amount of MDMA, in violation of Title 21, United States Code, Section 841(b)(1)(C); (ix) mixtures and substances containing a detectable amount of amphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(C); (x) mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 848(a), 848(b), 848(c).)

**COUNT TWO**  
**(Narcotics Conspiracy)**

7. From at least in or about October 2020, up to and including on or about the date of the filing of this Complaint, in the Southern District of New York, and elsewhere, RUI-SIANG LIN, a/k/a “林睿庠,” the defendant, and others known and unknown, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

8. It was a part and an object of the conspiracy that RUI-SIANG LIN, a/k/a “林睿庠,” the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

9. The controlled substances that RUI-SIANG LIN, a/k/a “林睿庠,” the defendant, conspired to distribute and possess with intent to distribute were (i) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A); (ii) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A); (iii) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A); (iv) 10 grams and more of mixtures and substances containing a detectable amount of lysergic acid diethylamide (LSD), in violation of Title 21, United States Code, Section 841(b)(1)(A); (v) 100 kilograms or more of a mixture or substance containing a detectable amount of marihuana in violation of Title 21, United States Code, Section 841(b)(1)(B);

(vi) mixtures and substances containing a detectable amount of Oxycodone, in violation of Title 21, United States Code, Section 841(b)(1)(C); (vii) mixtures and substances containing a detectable amount of ketamine, in violation of Title 21, United States Code, Section 841(b)(1)(C); (viii) mixtures and substances containing a detectable amount of Methylenedioxymethamphetamine (“MDMA”), in violation of Title 21, United States Code, Section 841(b)(1)(C); (ix) mixtures and substances containing a detectable amount of amphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(C); (x) mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846)

**COUNT THREE**

**(Money Laundering - Concealment)**

10. From at least in or about October 2020, up to and including on or about the date of the filing of this Complaint, in the Southern District of New York, and elsewhere, RUI-SIANG LIN, a/k/a “林睿庠,” the defendant, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such a financial transaction, which transaction affected interstate and foreign commerce and involved the use of a financial institution which was engaged in, and the activities of which affected interstate and foreign commerce, and which in fact involved the proceeds of specified unlawful activity, to wit, narcotics trafficking, and conspiracy to commit narcotics trafficking, in violation of Title 21, United States Code, Sections 841 and 846, respectively, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity.

(Title 18, United States Code, Section 1956(a)(1)(B)(i), and 2)

**COUNT FOUR**

**(Money Laundering - Promotional)**

11. From at least in or about October 2020, up to and including on or about the date of the filing of this Complaint, in the Southern District of New York, and elsewhere, RUI-SIANG LIN, a/k/a “林睿庠,” the defendant, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer, a monetary instrument and funds from a place in the United States to and through a place outside the United States and to a place in the United States from and through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, narcotics trafficking, and conspiracy to commit narcotics trafficking, in violation of Title 21, United States Code, Sections 841 and 846, respectively.

(Title 18, United States Code, Section 1956(a)(2)(A), and 2)

**COUNT FIVE**  
**(Money Laundering Conspiracy)**

12. From at least in or about October 2020, up to and including on or about the date of the filing of this Complaint, in the Southern District of New York, and elsewhere, RUI-SIANG LIN, a/k/a “林睿庠,” the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit money laundering, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i), and 1956(a)(2)(A).

13. It was a part and an object of the conspiracy that RUI-SIANG LIN, a/k/a “林睿庠,” the defendant, and others known and unknown, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such a financial transaction, which transaction affected interstate and foreign commerce and involved the use of a financial institution which was engaged in, and the activities of which affected, interstate and foreign commerce, and which in fact involved the proceeds of specified unlawful activity, to wit, narcotics trafficking, and conspiracy to commit narcotics trafficking, in violation of Title 21, United States Code, Sections 841 and 846, respectively, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i).

14. It was further a part and an object of the conspiracy that RUI-SIANG LIN, a/k/a “林睿庠,” the defendant, and others known and unknown, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer, a monetary instrument and funds from a place in the United States to and through a place outside the United States and to a place in the United States from and through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, narcotics trafficking, and conspiracy to commit narcotics trafficking, in violation of Title 21, United States Code, Sections 841 and 846, respectively, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

(Title 18, United States Code, Section 1956(h).)

**COUNT SIX**  
**(Conspiracy to Sell Adulterated and Misbranded Medication)**

15. From at least in or about October 2020, up to and including on or about the date of the filing of this Complaint, in the Southern District of New York, and elsewhere, RUI-SIANG LIN, a/k/a “林睿庠,” the defendant, and others known and unknown willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit offenses against the United States, to wit, selling adulterated and misbranded drugs in violation of Title 21, United States Code, Sections 331, 333(a)(2).

16. It was a part and an object of the conspiracy that RUI-SIANG LIN, a/k/a “林睿,” the defendant, and others known and unknown with the intent to defraud and mislead, would and did introduce and deliver for introduction into interstate commerce, and attempt to do the same, and would and did cause the introduction and delivery for introduction into interstate commerce,

and attempt to do the same, of adulterated and misbranded drugs, as defined by 21 U.S.C. §§ 351(a)(1), 351(a)(3), 352(a), 352(b), 352(f), and 352(o), in violation of 21 U.S.C. §§ 331(a) and 333(a)(2), 333(i) to wit, LIN and others known and unknown sold misbranded and counterfeit medication over the internet.

#### Overt Acts

17. In furtherance of the conspiracy and to effect its illegal objects, RUI-SIANG LIN, a/k/a “林睿,” the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about December 5, 2023, in the Southern District of New York, law enforcement officers received five tablets, which were purchased on an online narcotics marketplace operated by LIN and shipped by the seller on the online narcotics marketplace to an address in the Southern District of New York. Those five tablets bore the mark of a particular licensed pharmaceutical manufacturer, but those five tablets were not, in fact, produced by that licensed manufacturer.

(Title 18, United States Code, Section 371.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

#### Overview

18. Based on my involvement in this investigation, my training and experience, my review of documents and other materials, as well as my conversations with law enforcement officers and others, I have learned the following, among other things:

a. RUI-SIANG LIN, a/k/a “林睿,” the defendant, is the principal administrator and operator of one of the largest illegal narcotics marketplaces on the internet (“Marketplace-1”). LIN oversees the day-to-day operation of Marketplace-1, which has sold tens of millions of dollars’ worth of heroin, cocaine, methamphetamine, LSD, and other illegal narcotics. As the principal administrator of Marketplace-1, LIN has ultimate control over more than one thousand vendors (those who sell narcotics on Marketplace-1), more than 200,000 customers (those who buy narcotics on Marketplace-1), and at least one other employee who assists LIN in the management of the site.

b. Marketplace-1 launched in or about October 2020. Since that time, and through the date of this Complaint, Marketplace-1 can be accessed via the Internet using widely available encrypted and anonymous internet browsing software known as the “Tor” web browser.<sup>1</sup> Using

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<sup>1</sup> A Tor web browser allows individuals to access the Onion Router (“Tor”) network sometimes known as the “darkweb” or “darknet.” Tor allows individuals to obscure their true IP addresses and their Internet traffic, by encrypting both the content of their internet traffic and the signaling information, and by directing that internet traffic to and from web sites on the Tor network through a series of intermediary relays. Although the Tor network has legitimate uses, based on my training and experience, I have learned that the Tor network is often used for criminal

that software, Marketplace-1 can be accessed from anywhere in the world, including from the Southern District of New York.

c. Marketplace-1 does not sell narcotics directly to customers. Instead, Marketplace-1 is an e-commerce platform that enables its “customers” to purchase narcotics from “vendors,” who advertise narcotics on Marketplace-1. Each “vendor” is required to register with Marketplace-1. If approved by Marketplace-1 employees, each vendor can list for sale virtually any illegal narcotic they wish, for any price they choose. “Customers” also must register with Marketplace-1. After registering, customers can select which narcotics to purchase from which vendor and can pay for those narcotics using cryptocurrency, in transactions facilitated by Marketplace-1’s “bank.” Both vendors and customers use Marketplace-1’s bank to conduct narcotic transactions, which means both vendors and customers deposit money with Marketplace-1 and use Marketplace-1 to exchange money, as outlined in greater detail below. In exchange for its services, Marketplace-1 earns approximately 5% of the purchase price of every narcotic sold on Marketplace-1.

d. As the principal administrator of Marketplace-1, LIN profits the most from Marketplace-1’s activities. LIN also implements policies for the site, and ultimately determines whether a particular vendor is permitted to sell narcotics on Marketplace-1. LIN also directs the activities of at least one other employee, who (at LIN’s ultimate direction) assists in the management of the day-to-day operations of Marketplace-1. (The number of employees has fluctuated since the launch of Marketplace-1.)

e. Based on evidence uncovered through this investigation, in its more than three years of operations, Marketplace-1 has transacted approximately \$80,000,000 in cryptocurrency and sold more than one thousand kilograms of narcotics, misbranded prescription medication, and other illicit products—including at least 364 kilograms of cocaine, 295 kilograms of methamphetamine, and 92 kilograms of MDMA. LIN has earned millions in personal profits for his work as the principal administrator of Marketplace-1.

### **Marketplace-1’s Operations**

19. Based on my involvement in this investigation, my training and experience, my review of documents and other materials, including my personal review of Marketplace-1, as well as my conversations with law enforcement officers and others, I have learned the following, among other things:

a. Marketplace-1 has several established rules (which are posted on Marketplace-1) an individual must comply with before he or she is approved as a vendor on the site. Among other things, vendors must “apply” to the administrators, describe their prior experience as a vendor on the darknet, identify whether they were (or are) a vendor at any other darknet markets, and pay a non-refundable fee of \$750 to Marketplace-1. By applying to the site, vendors acknowledge that 5% of their gross revenue will be paid to Marketplace-1.

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activity, including to sell, and purchase, illegal products. Indeed, there are a number of darknet narcotics markets available on Tor, although Marketplace-1 appears to be one of the largest.

b. Even if they are accepted, vendors can be removed from Marketplace-1 for engaging in scams, generating a high volume of negative feedback from customers, refusing to answer inquiries from Marketplace-1 administrators, and/or posting their own feedback to boost their own sales. The decision to remove a vendor from Marketplace-1 solely rests with the administrators and, in particular, with the primary administrator of the site (“Administrator-1”)—who, as explained in greater detail below, is RUI-SIANG LIN, a/k/a “林睿康,” the defendant.

c. Vendors are ranked on Marketplace-1 by positive customer reviews and sales volume. Marketplace-1 even trumpets the highest ranked vendors in top-ten lists available on the site.

d. Both vendors and customers can submit “disputes” to the administrators of Marketplace-1. To submit a dispute, a customer or vendor fills out a form containing information about the nature of the dispute and transmits it to the administrators. A customer might submit a dispute if, for example, they paid for, but did not receive, narcotics. Vendors might submit a dispute if they believe a customer posted misleading negative feedback. Marketplace-1 administrators resolve disputes at their discretion. They can refund sales, remove customers, or take any other action they see fit. Administrator-1 appears to retain the ultimate decision-making authority concerning customer and vendor disputes.

e. Marketplace-1 operates its own “bank.” The “bank” is an important component of Marketplace-1’s business. Customers deposit cryptocurrency<sup>2</sup> such as Bitcoin<sup>3</sup> or Monero<sup>4</sup> into the Marketplace-1 bank and use deposited funds to make purchases from vendors. Once a purchase is made, cryptocurrency is transferred from a buyer’s “bank” account to the vendor’s “bank” account. Both vendors and buyers can withdraw from the “bank” into their personal cryptocurrency wallets.<sup>5</sup> By depositing money into the bank, both customers and vendors evidence

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<sup>2</sup> Cryptocurrency is a digital currency designed to work as a medium of exchange through a computer network that is not reliant on any central authority, such as a government or bank, to uphold or maintain it. Asset records are maintained by a digital ledger (also known as a blockchain), which is a computerized database that tracks cryptocurrency ownership. The digital ledger is maintained by a decentralized network of computing devices throughout the world. Cryptocurrencies are highly volatile and can be purchased through a number of methods, including through cryptocurrency exchanges, which are online services that enable users to exchange fiat currency (e.g. U.S. Dollars) for cryptocurrencies.

<sup>3</sup> Bitcoin is the world’s most popular cryptocurrency. It is known in shorthand as “BTC.” The Bitcoin digital ledger is publicly available, and its transactions can be analyzed using software tools.

<sup>4</sup> Monero is a cryptocurrency which uses a blockchain with privacy-enhancing technologies to attempt to obfuscate transactions and seek to achieve anonymity and fungibility. In shorthand “Monero” is known as “XMR.”

<sup>5</sup> A cryptocurrency wallet can be a physical device or a software program that stores cryptocurrency passwords and allow users to access their digital currency. Wallets typically have addresses, which are a long string of characters. That “wallet address” corresponds to entries on

a substantial amount of trust in Marketplace-1 and, specifically, in its administrators. This is because once deposited, customer and vendor money is under the control, and in the possession, of Marketplace-1.<sup>6</sup> The “bank” is also designed to further obscure the locations and identities of vendors and customers from each other and from law enforcement by adding a layer of anonymity to transactions on the marketplace and keeping the financial information of vendors and buyers separate, making it more difficult for any one actor on the marketplace to learn any other actor’s true identity. As further explained below, the bank also offers an “escrow” service enabling both buyers and customers to have additional security concerning their narcotics transactions.

f. Marketplace-1 offers its users the ability to transfer cryptocurrency among users and provides a user-to-user anonymous chat service.

g. Marketplace-1 offers a “community governance” program on its website. This program permits users (those who meet certain buying or selling thresholds) to vote on rules and regulations for Marketplace-1.

### **Narcotics Listings on Marketplace-1**

20. Based on my involvement in this investigation, my training and experience, my review of documents and other materials, as well as my conversations with law enforcement officers and others, I have learned the following, among other things:

a. Marketplace-1 has extensive advertisements for a broad array of narcotics including, but not limited to, heroin, cocaine, methamphetamines, LSD, PCP, and oxycodone. To advertise these drugs, each vendor posts a short description of the narcotics offered for sale and, if they choose, a photograph. Descriptions of narcotics include, by way of example, the following:

- i. “Sweet Mama’s China White Synthetic \*EXTREMELY POTENT\*,”
- ii. “x10 OP80 80mg Oxycodone OcyContin/free shipx;”
- iii. “0.5G High POTENT White Lion Stamp Heroin .HIGHEST PURITY;”
- iv. “[Featured] 1G-28G Pure Colombian Cocaine (88-91%) NDD, HQ TR24;”
- v. “Top Quality GHB;”
- vi. “[Featured] #PURE AFGHAN HEROIN \*uncut\* TOP Quality (A\*) (NDD AVAILABLE);”

the digital ledger or blockchain. That is, the blockchain will indicate how many digital coins a particular wallet owns.

<sup>6</sup> Several darknet markets have been accused of an “exit scam.” An exit scam is when a marketplace stops transmitting money it holds in escrow while it continues to take deposits. The operators of the marketplace collect as many deposits as they can and then shut down the site and steal the deposited money.

vii. "Lucky's IRANIAN OPIUM;"

viii. "M30 OXYCODONE 30mg x 500;"

ix. "1G CHINA WHITE HEROIN (WORLDWIDE)."

b. Marketplace-1 also has extensive advertisements for a broad array of narcotics sold by vendors located in foreign countries who ship their narcotics into the United States. For example:

i. A particular vendor who offers for sale "S-ISO Ketamine," for \$4500 per kilogram ships such narcotics from the United Kingdom to, among other places, the United States.

ii. A particular vendor who offers for sale "Ether Washed Coke" for \$110 ships such narcotics from Canada to, among other places, the United States.

iii. A particular vendor who offers for sale "Coke 94.50% from Colombia," for \$625.71 for 5 grams, ships such narcotics from Germany to, among other places, the United States.

iv. A particular vendor who offers for sale "PURE PIKO Methamphetamine Crystal Meth ICE Shards" for \$43.58 ships such narcotics from Poland to, among other places, the United States.

v. A particular vendor who offers for sale "MDMA Dutch MDMA Champagne mdma 84% pure" for approximately \$18.54 per gram ships such narcotics from the Netherlands to, among other places, the United States.

vi. A particular vendor who offers for sale "10 tabs OxyContin 80mg MR AUTHENTIC OXYCODONE" for approximately \$227.92 per ten tablets ships such narcotics from Spain to, among other places, the United States.

vii. A particular vendor who offers for sale "LSD Blotters Reborn 350 ug Needlepoint Crystal 99% Labtested UK EU USA AUS WORLD" for approximately \$3.45 per ten units ships such narcotics from the Netherlands to, among other places, the United States.

viii. A particular vendor who offers for sale "Strong Heroin #3 +/- 65%" for approximately \$22.00 per gram ships such narcotics from the Netherlands to, among other places, the United States.

c. To assist its customers, Marketplace-1 organizes its narcotics listings into the following categories: anxiolytics, benzodiazepines, cannabis, cannabinoids, delirants, depressants, dissociatives, empathogens, nootropics, oneirogens, opioids, psychedelics, sedatives, steroids, stimulants, synthetics, tobacco, miscellaneous. Customers can also perform searches for narcotics or browse the listings through a graphical interface, similar to those available on legitimate e-commerce websites.

d. Indeed, much like a legitimate e-commerce site, each vendor on Marketplace-1 has a page which lists, among other things, the number of successful sales for each product and reviews from that vendor's customers. In this way, customers rate the vendors for the quality of their narcotics, reliability, and delivery speed. Based on my review of Marketplace-1, there are thousands of reported successful narcotics transactions for, among other things, cocaine, heroin, oxycodone, LSD, and methamphetamines. The reviews corroborate that the sales of narcotics on Marketplace-1 are, in fact, narcotics transactions.

e. To further corroborate that Marketplace-1 sells illegal narcotics, law enforcement officers made several undercover purchases from vendors on Marketplace-1, including:

i. On or about April 6, 2022, while using a particular undercover identity ("UC-1") and, using a computer located in Manhattan, New York, I ordered 5 grams of "Crystal Meth" from a vendor on Marketplace-1. I paid approximately \$170, via Bitcoin, by depositing Bitcoin into Marketplace-1's bank. When purchasing the "crystal meth," I designated a shipment address to a particular mailbox in Manhattan, New York, which is controlled by law enforcement officers ("Mailbox-1"). On or about April 12, 2022, law enforcement officers recovered a package, which contained a powdery substance. That substance was later tested and assessed to be approximately 5 grams and tested positive for the presence of methamphetamine hydrochloride.

ii. On or about February 2, 2023, while using the UC-1 identity and a computer located in Manhattan, New York, I ordered "M30 (PRESSED) \$8.99 EACH 60X STRONGER THAN HEROIN" from a particular vendor on Marketplace-1. I paid approximately \$50, via Bitcoin, by depositing Bitcoin into Marketplace-1's bank. When purchasing the "M30 (PRESSED) \$8.99 EACH 60X STRONGER THAN HEROIN," I designated Mailbox-1 as the shipment address. On or about February 7, 2023, law enforcement officers recovered a package, which contained approximately two pills. Those pills were later tested and assessed to be approximately 0.210 grams and tested positive for the presence of fentanyl.

iii. On or about November 28, 2023, while using another particular undercover identity ("UC-2") and a computer located in Manhattan, New York, I ordered "M30 Pressed OXY PILLS -HIGH QUALITY -USPS" from a particular vendor on Marketplace-1. I paid approximately \$43.60, via Bitcoin, by depositing Bitcoin into Marketplace-1's bank. When purchasing the "M30 Pressed OXY PILLS -HIGH QUALITY -USPS," I designated Mailbox-1 as the shipment address. On or about December 5, 2023, law enforcement officers recovered a package, which contained approximately five tablets. Those five tablets had imprinted on them an "M." Those five tablets were later tested and assessed to be approximately 0.569 and tested positive for the presence of fentanyl.<sup>7</sup>

iv. On or about November 29, 2023, while using the UC-2 identity and a computer located in Manhattan, New York, I ordered "5MG[OXYCODONE][OXYCONTIN][OC 5]"

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<sup>7</sup> Based on my review of documents and conversations with law enforcement officers from the Federal Drug Administration, I have learned that a particular licensed pharmaceutical manufacturer ("Manufacturer-1"), and a company it licenses, are the only two entities authorized to manufacture tablets bearing an "M." Manufacturer-1 has not authorized tablets bearing an "M" to be manufactured containing fentanyl. Accordingly, these tablets appear to be counterfeit.

USA TO USA|LOW MIN ORDER” from a particular vendor on Marketplace-1. I paid approximately \$44, via Monero, by depositing Monero into Marketplace-1’s bank. When purchasing the “5MG|OXYCODONE|OXYCONTIN|OC 5| USA TO USA|LOW MIN ORDER,” I designated Mailbox-1 as the shipment address. On or about December 6, 2023, law enforcement officers recovered a package, which contained approximately five pills. Those five pills were later tested and assessed to be approximately 0.663 grams and tested positive for the presence of oxycodone.

v. On or about December 8, 2023, while using the UC-2 identity and a computer located in Manhattan, New York, I ordered 1 gram of “JIRAFFE\*CHINA WHITE HEROIN MIX\*FAST USPS\*CHINA WHITE” from a particular vendor on Marketplace-1. I paid approximately \$90, via Bitcoin, by depositing Bitcoin into Marketplace-1’s bank. When purchasing the “JIRAFFE\*CHINA WHITE HEROIN MIX\*FAST USPS\*CHINA WHIT,” I designated Mailbox-1 as the shipment address. On or about December 20, 2023, law enforcement officers recovered a package, which contained a powdery substance. That powdery substance was later tested and assessed to be approximately 0.97 grams and tested positive for the presence of fentanyl.

vi. On or about January 4, 2024, while using the UC-2 identity and a computer located in Manhattan, New York, I ordered “one unit” of “BEST Cocaine in America FREE SHIPPING!” from a particular vendor on Marketplace-1.<sup>8</sup> I paid approximately \$47, via Bitcoin, by depositing Bitcoin into Marketplace-1’s bank. When purchasing one unit of “BEST Cocaine in America FREE SHIPPING!,” I designated Mailbox-1 as the shipment address. On or about January 18, 2024, law enforcement officers recovered a package, which contained a powdery substance, which, based on the training and experience of the law enforcement officer who recovered the package, appeared to be a controlled substance. Testing of the powdery substance is pending.

vii. On or about January 11, 2024, while using the UC-2 identity and a computer located in Manhattan, New York, I ordered “150mcg LSD Gel Tabs - Stronger and better (5 tabs packs)” from a particular vendor on Marketplace-1. I paid approximately \$46.70, via Bitcoin, by depositing Bitcoin into Marketplace-1’s bank. When purchasing one unit of “150mcg LSD Gel Tabs - Stronger and better (5 tabs packs)” I designated Mailbox-1 as the shipment address. On or about January 18, 2024, law enforcement officers recovered a package, which contained a package of gel tablets which, based on the training and experience of the law enforcement officer who recovered the package, appeared to be a controlled substance. Testing of the gel tablets substance is pending.

### **Searches of Marketplace-1 Servers**

21. Based on my involvement in this investigation, my training and experience, my review of documents and other materials, as well as my conversations with law enforcement officers and others, I have learned the following, among other things:

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<sup>8</sup> The listing did not specify the weight of cocaine associated with “one unit.”

a. Law enforcement officers executed a search warrant on or about July 20, 2022 and a second search warrant on or about August 2, 2023, on several servers that host data for Marketplace-1—including “Server-1” and “Server-2.” Law enforcement officers executed search warrants on or about August 16, 2022 and on or about January 5, 2024, on additional servers including “Server-3.” As explained herein, Server-1 appears to be a DDoS prevention system for Marketplace-1.<sup>9</sup> Server-2 appears to host the back-end Marketplace-1 data, including a history of all completed narcotics transactions. Server-3 appears to be the server responsible for Marketplace-1’s bank, including its cryptocurrency transactions. Law enforcement officers corroborated that Server-1, Server-2, and Server-3 are Marketplace-1 servers based on, among other things, the following:

i. Server-1 is leased to a particular company (“Company-1”). Company-1 is a “server reseller.” That is, Company-1 stands between an end client who leases server space from Company-1 and a server provider, another company, from whom Company-1 leases server space. This structure is common in illegal activities on the internet because it helps the end client hide their identity from a server provider. Indeed, here, Company-1 is a foreign company that advertises itself as an entity which offers servers for darknet marketplaces. A particular end-client (“End-Client-1”) leased Server-1 from Company-1 on or about January 10, 2022. The day prior, on or about January 9, 2022, End-Client-1 leased Server-2 from Company-1. End-Client-1 told Company-1, in substance and in part, to place Server-1 in “the closest possible proximity” to Server-2.<sup>10</sup>

ii. From on or about January 30, 2023, through on or about May 9, 2023, law enforcement officers obtained a Pen Register and Trap and Trace order on Server-2 (the “PRTT”). The PRTT had more than approximately 14,000,000 connections to Server-1, which further indicates that Server-1 operated as “filter” for Server-2 to thwart DDoS attacks. Further, based on law enforcement officers’ review of the content of Server-1, law enforcement officers have assessed that Server-1 is designed to protect Server-2 from DDoS attacks.

iii. During the time that the July 19, 2022 search warrant was executed, Server-1 and Server-2 were briefly taken offline. At the time that Server-1 and Server-2 were taken offline, I observed that Marketplace-1 went offline. When Server-1 and Server-2 were reconnected to the internet, I observed that Marketplace-1 went back online. These observations further corroborate that Server-1 and Server-2 are servers that host Marketplace-1’s data.

iv. Based on a review of Server-2’s data, law enforcement officers, and others working with the FBI, observed that Server-2 hosted data necessary to run Marketplace-1. This

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<sup>9</sup> DDoS attacks, also known as Distributed Denial of Service attacks, are when malicious cyber actors attempt to disrupt the normal traffic of a particular server, service, or network by overwhelming the target or its surrounding infrastructure with a flood of Internet traffic. Based on my training and experience, I have learned that darknet marketplaces are often the target of DDoS attacks by rival marketplaces.

<sup>10</sup> Based on my training and experience, I have learned that placing servers in proximity enables more efficient communication and is typically done when servers are to be in ongoing communication.

includes, among other things, databases pertaining to Marketplace-1, narcotics transaction information (discussed in detail, *infra* ¶ 22), and file folders bearing Marketplace-1's true name.

v. Based on a review of Server-2, law enforcement officers further observed that Server-2 was connected to another server, Server-3, via "SSH Tunnels." SSH Tunneling is a way two computers (or servers) connect over a secure encrypted connection. Based on my training and experience, generally, when two computing devices are connected via SSH tunnel, it indicates those computing devices share information, data, and are generally trusted by each system. I have also learned it is common for market administrator(s) to create SSH tunnels among several compartmentalized servers to allow them to be more easily accessed by all the other servers, and to route data in an encrypted state.

vi. Based on a review of Server-3, it contains, among other things, data corresponding to cryptocurrency transactions. Specifically, law enforcement officers observed Bitcoin wallets and Monero wallets stored in Server-3 (discussed in detail, *infra* ¶ 22). Based on review of this information, law enforcement officers observed Bitcoin transaction hashes and a Monero transaction hash pertaining to each of the undercover narcotics purchases through on or about January 5, 2024 that I had made using the identities of UC-1 and UC-2, which are described above.<sup>11</sup> (*Supra* ¶ 20.e.) This further corroborates that Server-3 (and Server-2 to which it is connected) maintains data for Marketplace-1.

b. Accordingly, I believe that Server-1, Server-2, and Server-3 are servers used to operate Marketplace-1 and contain data from Marketplace-1.

### **Volume of Narcotics Sales on Marketplace-1**

22. Based on my involvement in this investigation, my training and experience, my review of documents and other materials, as well as my conversations with law enforcement officers and others, I have learned the following, among other things:

a. As described above, Server-2 appears to contain the "back-end" data used to operate Marketplace-1. Law enforcement officers identified database files in a folder titled "[Marketplace-1]." Within are approximately dozens of database files that bear unique names including: "vendors," "users," and "orders." Each of those database files were analyzed and converted into tables with data arranged in both rows and columns.

b. The "vendors" table contains approximately 1,312 vendor usernames. Accordingly, based on the data in Server-2, Marketplace-1 appears to have 1,312 vendor accounts as of on or about August 2, 2023. Based on the vendors table, as of on or about August 2, 2023, approximately 756 vendors are listed as vendors who are located abroad and ship narcotics into the United States. The vendors table further indicates that those approximately 756 vendors offer shipments of narcotics including, among others, cocaine, heroin, ketamine, LSD, MDMA, marijuana, methamphetamine, amphetamine, and oxycodone into the United States.

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<sup>11</sup> Each Bitcoin and Monero transaction is associated with a unique hash value. The hash value is a unique long string of computer-generated characters used to identify a transaction on a blockchain.

c. The “users” table contains approximately 255,519 usernames (including username identities used by UC-1). Accordingly, based on the data in Server-2, Marketplace-1 appears to have 255,519 customer accounts as of on or about August 2, 2023.

d. The “orders” table appears to list every Marketplace-1 transaction. There are approximately 224,791 transactions based on the number of rows of data in the “orders” table—*i.e.*, each row indicates a different transaction. Further corroborating that this is Marketplace-1 data, within the “orders” table is a row corresponding to the April 6, 2022 UC-1 transaction and a row corresponding to the February 8, 2023 UC-1 transaction. (*See supra* ¶¶ 20.e.i, ii.)

e. There are multiple columns in the “orders” table, which appear to list particular information for each transaction including: “buyer” (*i.e.* the username of the buyer), “vendor” (*i.e.* the username of the vendor), “listing\_name” (*i.e.*, the title of the sales listing) “usd\_total” (*i.e.*, the United States dollar value of the transaction), “btc\_total” (*i.e.*, the Bitcoin value of the transaction), “xmr\_total” (*i.e.*, the Monero value of the transaction), “timestamp” (*i.e.*, the date and time of the transaction), “status” (*i.e.*, whether the transaction was “finalized,” “cancelled,” “refunded,” etc.), “currency” (*i.e.*, the currency used for the transaction, e.g. BTC or XMR), and “quantity” (*i.e.*, the amount of narcotics in each transaction).

f. The investigative team analyzed the “orders” table and used the information in the “listing\_name,” “timestamp,” “quantity,” and “status” fields to assess the approximate total weight of narcotics sold on Marketplace-1, according to the data in Server-2. To make this assessment, a computer program analyzed the “listing\_name” column to group each transaction by the type of narcotic sold.<sup>12</sup> Thereafter, the information in the “quantity” column was assessed for each

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<sup>12</sup> As described above, many listing names use slang terms for narcotics. To analyze the data, the following slang terms were used to identify various narcotics, which, based on my training and experience are common slang terms for the corresponding narcotic:

- (1) Alprazolam: “alprazolam,” “xanax”;
- (2) Amphetamine: “amphetamine,” “bennies,” “uppers,” “methadate”;
- (3) Cocaine: “cocaine,” “coke”;
- (4) Heroin: “heroin,” “china white”;
- (5) Ketamine: “ketamine,” “special k,” “k2,” “vitamin k,” “kit kat”;
- (6) LSD: “lsd,” “acid,” “blotter,” “dots,” “sugar cubes”;
- (7) Marijuana: “marijuana,” “pot,” “weed,” “skunk,” “hash,” “herb,” “bud,” “grass,” “mary jane,” “reefer,” “trees,” “flower,” “thc,” “haze”;
- (8) MDMA: “mdma,” “ecstasy,” “molly,” “mda”;
- (9) Methamphetamine: “methamphetamine,” “meth,” “blue,” “ice,” “crystal”; and
- (10) Oxycodone: “oxycodone,” “oxycontin,” “percocet,” “o.c.,” “oc,” “oxy,” “oxycet,” “oxycotton,” “ozone,” “roxy”; “M30”; “M60”.

transaction.<sup>13</sup> Orders with a “cancelled” status were omitted. The result of the analysis yields the following approximate narcotics weight for the time period from on or about October 2, 2021 through on or about August 2, 2023:

| Narcotic        | Weight (kg) |
|-----------------|-------------|
| Amphetamine     | 112.34      |
| Cocaine         | 364.20      |
| Heroin          | 10.50       |
| Ketamine        | 108.65      |
| LSD             | 0.51        |
| MDMA            | 92.19       |
| Marijuana       | 402.37      |
| Methamphetamine | 295.41      |
| Oxycodone       | 1.03        |

g. The investigative team analyzed the “orders” table and used the information in “listing\_name,” “timestamp” and “usd\_total” columns to assess the approximate total United States dollar value of narcotics sold on Marketplace-1 according to this dataset. A computer program analyzed the “listing\_name” column to sort the transactions by type of narcotic using the same parameters as the weight assessment described in footnote 12. Thereafter, the information in the usd\_total field was assessed for each transaction.<sup>14</sup> The result of that analysis yields the following approximate total value of narcotics sold for the time period from on or about October 2, 2021 through on or about August 2, 2023:

| Narcotic    | “usd_total”    |
|-------------|----------------|
| Amphetamine | \$446,094.72   |
| Cocaine     | \$7,851,009.85 |
| Heroin      | \$819,687.57   |
| Ketamine    | \$2,896,264.23 |
| LSD         | \$965,158.61   |
| MDMA        | \$1,946,423.63 |
| Marijuana   | \$2,793,636.69 |

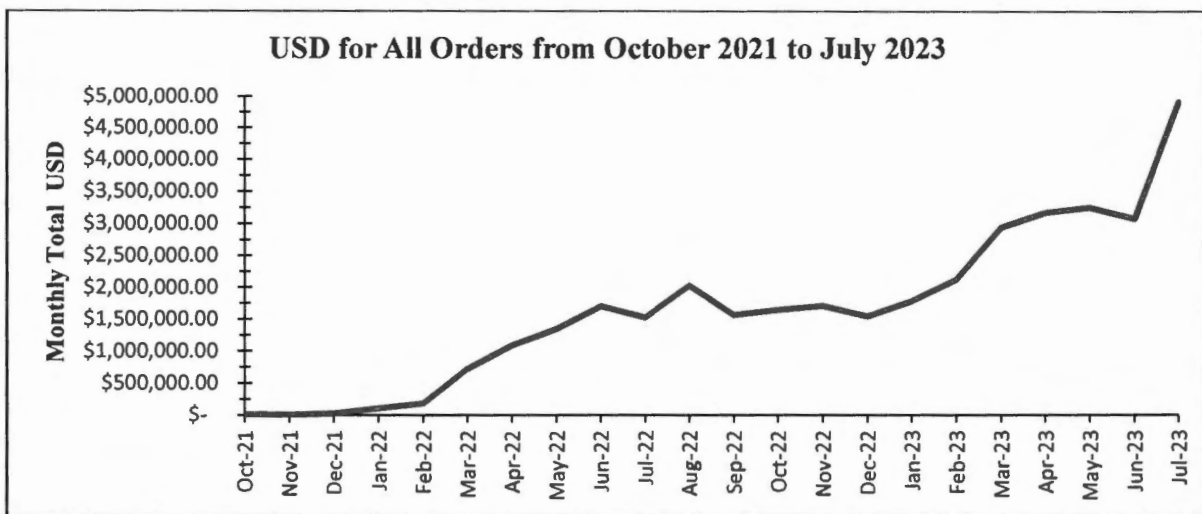
<sup>13</sup> Generally, quantity contains information in the following format: “X\*Y(unit of measure)”—e.g. “1\*5g.” An asterisk is a common signal for a multiplication operator in software coding. To confirm that the \* indicates multiplication, investigative personnel compared rows in the “orders” table to listings on Marketplace-1 and also examined the row corresponding to UC-1’s April 6, 2022 transaction. In the April 6, 2022 transaction UC-1 purchased 5 grams, and the “quantity” information in the “orders” table for that transaction is “1\*5g,” which further corroborates the asterisk is a multiplication operator. Where the “quantity” column did not list a unit of measure, for example “1\*2 pills,” the row was excluded from the weight calculation unless the title listing indicated the weight. If weight information was missing in the quantity tab, for example, 1\*gram, the assessed weight was “1” which was consistent based on a comparison to Marketplace-1 listings on the public website.

<sup>14</sup> It appears that the usd\_total information was converted from the value of cryptocurrency transacted.

| Narcotic        | "usd_total"    |
|-----------------|----------------|
| Methamphetamine | \$3,453,924.50 |
| Oxycodone       | \$2,061,173.93 |

h. With respect to the time period from on or about July 3, 2022 through on or about August 2, 2023, the data in Server-2 indicates that vendors on Marketplace-1 sold approximately \$6.5 million of cocaine, \$724,000 of Heroin, \$847,7000 of LSD, and \$3.06 million of Methamphetamine—approximately \$11,198,000 in total.

i. A review of the "orders" table further indicates that Marketplace-1's sales volume has increased over time. The below chart plots the approximate monthly gross sales volume on Marketplace-1, inclusive of all substances and products sold based on the data in Server-2:



#### Administrator-1

23. Based on my involvement in this investigation, my training and experience, my review of documents and other materials, as well as my conversations with law enforcement officers and others, I have learned the following, among other things:

a. Presently, including Administrator-1, at least two employees manage the day-to-day operations of Marketplace-1. Each employee uses a particular pseudonym to identify themselves in Marketplace-1 and across other internet platforms such as, for example, forums including "Forum-1."<sup>15</sup> In so doing, the employees generate notoriety, which serves as an advertisement for the marketplace, and establish credibility within the broader darknet market community. Based on my involvement in this investigation including my review of darknet market forums, and of Marketplace-1, from the launch of Marketplace-1 in or about October 2020 through

<sup>15</sup> Forum-1 is a popular darknet online forum in which users discuss issues pertaining to darknet markets. Many illegal darknet marketplaces, including Marketplace-1, promote themselves on Forum-1. Administrator-1 frequently posts on Forum-1 about Marketplace-1, cryptocurrency, and other issues related to the darknet.

in or about February 2022, a particular individual (“Administrator-2”) appeared to the principal administrator of Marketplace-1. During that time Administrator-1 worked, in a management capacity, at Marketplace-1. As of in or about February 2022, I believe that Administrator-1 became (and still is) the principal administrator of Marketplace-1.

b. Forum-1 operates several “sub-forums,” each of which is dedicated to a particular subject. For example, many large darknet markets have their own sub-forum on Forum-1. Forum-1 also maintains sub-forums on topics such as “op-sec,” “darknet markets,” “monero,” and “hacking”. On or about October 19, 2020, Forum-1 opened a sub-forum dedicated to Marketplace-1 (“Marketplace-1 sub-forum”). The Marketplace-1 subforum was opened to assist in the launch of Marketplace-1.

c. On or about November 9, 2020, Administrator-2 authored a post in the Marketplace-1 sub-forum “announcing” Marketplace-1’s “Beta Launch.” The post indicated that vendors and buyers would initially be capped “to prevent against unsustainable growth.”

d. On or about November 11, 2020, Administrator-2 authored a post in the Marketplace-1 sub-forum, which responded to feedback from the Beta Launch, and stated, in substance and in part, that Marketplace-1 would not sell opiates, that its administrators were recruiting vendors, and that “employment” opportunities with Marketplace-1 might be open to those interested in the future.

e. On or about May 22, 2021, Administrator-1 authored a post on Forum-1 titled “[Marketplace-1] is now fully developed with wonderful new features!” The post further stated, in substance and in part, that Marketplace-1 would now offer a chat feature and a referral program, had an improved user layout, and accepted both Bitcoin and Monero. This post appears to mark the official (*i.e.*, non-Beta) launch of Marketplace-1.

f. On or about December 6, 2021, Administrator-1 authored a post on Forum-1 titled “[Marketplace-1] Welcome Buyers and Vendors.” The post stated, in substance and in part, that “we are a small but dedicated team that focuses on giving you the best market experience.” The post continued by listing various Marketplace-1 features including “a casino.”

g. On or about December 19, 2021, a user of Forum-1 posted a question regarding darknet markets in which the user queried, in substance and in part, “I often see the terms ‘Canary’ and ‘Mirror’ when I enter a market, could anyone tell me what I should do?” Administrator-1 responded, in substance and in part, “Canary is a PGP signed message that usually comes with a last updated date and crypto block has to prove that the site owner is still alive. Mirror is a list of official mirrors the is PGP signed.”<sup>16</sup>

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<sup>16</sup> PGP keys, which is short for “Pretty Good Privacy” keys, are cryptographically complicated string of letters and numbers that are used to, among other things, create a digital signature so the public can identify that a particular post is written by a particular individual.

h. On or about December 30, 2021, Administrator-1 authored a post in the Marketplace-1 subforum on Forum-1, which stated, in substance and in part, “[Marketplace-1] originally launched during the holidays last year. We’ve managed to maintain good continuous uptime during the year. Our small but dedicated team focuses on giving you the best market experience. If you’ve had some past experience with our feedback thread, you’ll definitely be amazed at how fast we implement your suggestions in a rolling update.” The post also listed several features of Marketplace-1. For example, the post stated, in substance and in part, “Vendor History. Not sure about whether or not to purchase from a vendor? No worries, we got you covered.”

i. On or about January 27, 2022, Administrator-2 responded to a question about “why opioids [sic] are not allowed” on Marketplace-1. Administrator-2 responded, in substance and in part “Because we can. . . . To that end, we can pick and choose whatever we wish to host or not host on our anonymous corporation. . . . [A]t this point in time (we may or may not change in the future, but for now), we disallow the sale of opioids and opiates.”

j. On or about February 23, 2022, Administrator-1 authored a post in the Marketplace-1 subforum on Forum-1, which stated, in substance and in part, “Blank Ban on Opioids Lifted. Dear all, The ban on opioid products is now lifted. However, fentanyl and related chemicals remain banned. Cheers.” Thereafter, Administrator-2’s stopped posting on Forum-1 and elsewhere. Indeed, at or about this time, the attribution signature for Administrator-2’s previous posts on Forum-1 were changed from “Administrator-2” to “deleted,” which signaled that Administrator-2 was no longer publicly involved in Marketplace-1.

k. Based on the foregoing, I believe that Administrator-1 served as an administrator, working with Administrator-2 for approximately one year until in or about February 2022, after which Administrator-1 took over from Administrator -2 as the principal administrator of Marketplace-1.

l. On other occasions, Administrator-1 has announced Marketplace-1 software upgrades, changes, and other announcements on Forum-1. These posts further evidence Administrator-1’s control over the operations of Marketplace-1. For example:

i. On or about February 23, 2022, Administrator-1 posted, in response to a user question, which asked whether heroin was permitted on Marketplace-1, “Only fent and related chemicals are banned.”

ii. On or about February 27, 2022, Administrator-1 authored a post in the Marketplace-1 subforum on Forum-1, which was titled “Explanation Unexpected Downtime – Back Online.” The post stated, in substance and in part, “One of our servers in the cluster crashed, leading the site to enter a precaution state. Currently, we have an automatic security system in place that detects system anomalies and will suspend the system or even migrate the entire infrastructure while wiping out the old cluster according to the severity. This is to prevent LE [law enforcement] takeover or hijacking of the servers. . . . We sincerely apologize for the downtime. And rest assured we’ll do our best to not let it happen again. P.S. We’re pushing a new major update today or tomorrow.”

iii. On or about February 27, 2022, Administrator-1 authored a post in the Marketplace-1 subforum, which, among other things, announced the end of operations of the Marketplace-1 casino.

iv. On or about March 1, 2022, Administrator-1 authored a post in the Marketplace-1 subforum, which, among other things, announced, in substance and in part, a new user interface and “Punk Avatars. . . Added punk avatars: randomly generated icons that represent you.”

v. On or about December 10, 2023, Administrator-1 posted, in substance and in part, “All services are restored and once again functional. . . . As you all witnessed (and a reason for the panic today), [Marketplace-1] has maintained a near flawless uptime for the past three years. Even with all those DDoS attacks going on last year, [a DDoS prevention software designed by Administrator-1] has kept the site stable. . . . We sincerely apologize for any inconvenience we have caused, and thank you all for believing in us!”<sup>17</sup>

vi. On or about December 23, 2023, Administrator-1 posted, in substance and in part, “Merry Christmas . . . We’re organizing a list of features and updates on our end, we’re listening to all your feedback. Promise I’ll get it all sorted out asap, after I deal with current issues at hand. Thank y’all for three years of support. . . . Sincerely [Administrator-1].”

m. On other occasions, Administrator-1 has posted about ways in which individuals can keep their illegal activities on the internet protected from law enforcement. Specifically, Administrator-1 posted about darknet marketplace operational security, speculated about efforts law enforcement takes to stop darknet markets, and offered tips to others. For example, on or about June 2021, Administrator-1 posted about “op-sec” (*i.e.* operational security) and speculated, in substance and in part, that a government would not seek to overtake the Tor network because it is not cost effective while they could, instead, “catch a bunch of low hanging fruit with bad opsec [*i.e.* darknet operators who do not provide sufficient operational security].”

n. Every fourteen or thirty days, the administrators of Marketplace-1 post a “canary” with their unique PGP key. The “canary,” as explained by Administrator-1’s December 19, 2021 post, *supra* ¶ 23.g, confirms to Marketplace-1 users that the site is operational and none of the administrators have been compromised. As of on or about December 18, 2023, the “canary” post named Administrator-1 as one of the Marketplace-1 administrators along with two other administrators who manage the day-to-day operations of Marketplace-1.

#### **Bank Wallet-1 and Administrator Wallet-1**

24. Based on my involvement in this investigation, my training and experience, my review of documents and other materials, as well as my conversations with law enforcement officers and others, I have learned the following, among other things:

a. All transactions on Marketplace-1 must use Marketplace-1’s bank. As explained above, Marketplace-1’s “bank” enables Marketplace-1 to retail and distribute narcotics securely

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<sup>17</sup> The reference to successful DDoS attack prevention may be a reference to the purpose of Server-1.

between users (e.g., buyers) and sellers (e.g., vendors). Through the bank, customers deposit cryptocurrency (Bitcoin or Monero) into the customer's Marketplace-1 bank account—essentially a cryptocurrency wallet. Once deposited, each user's marketplace wallet is controlled by Marketplace-1. Then, after a buyer purchases a product from a vendor (e.g., narcotics) Marketplace-1 releases funds to the vendor's Marketplace-1 bank account. In this way, Marketplace-1 serves as a financial link between vendors and customers and in so doing provides both parties a level of comfort that the transaction will be consummated, while also allowing the parties to maintain distance and anonymity between each other. Marketplace-1's bank also offers an escrow service, which provides sellers and buyers further protections. The escrow service can be set such that a buyer's money will be released to a seller only after specified actions occur, for example, the shipment of narcotics. With the escrow service, sellers know they will be paid for their illegal narcotics and buyers know their payments will be released to sellers after specified events occur. Although not every transaction on Marketplace-1 uses the bank's "escrow" services, many do.

b. Law enforcement officers identified the cryptocurrency wallets that Marketplace-1 uses for its bank (collectively, "Bank Wallet-1") and uses to funnel proceeds from Marketplace-1 to Administrator-1 ("Administrator Wallet-1"):

i. Pursuant to the January 2024 judicially authorized warrant, law enforcement officers searched Server-3. In Server-3, law enforcement officers identified the following directories (i.e. computer folder) `"/root/.bitcoin/wallets/[Marketplace-1] 1/";` `"/root/.bitcoin/wallets/[Marketplace-1] 2/";` `"/root/.bitcoin/wallets/[Marketplace-1] 3;` and `"/root/.bitcoin/wallets/[name of a cryptocurrency tracking software promoted by Administrator-1].` Each of these computer folders contains a Bitcoin wallet file. A Bitcoin wallet file is a database that contains public and private Bitcoin keys to a particular Bitcoin wallet.<sup>18</sup> Because each of these Bitcoin wallet files were found on Server-3 and are named [Marketplace-1] or the cryptocurrency tracking software promoted by Administrator-1, they appear to contain Marketplace-1 assets—specifically deposits made by customers and vendors into Bank-1.<sup>19</sup> For simplicity, these four wallets are defined herein as "BTC Bank Wallet-1."

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<sup>18</sup> Every cryptocurrency wallet comes with a corresponding pair of cryptographically generated PGP keys—one public and one private. Public keys identify particular cryptocurrency wallets and can be shared with anyone to identify a particular wallet. Private keys, on the other hand, are typically maintained securely as they allow anyone to control the funds inside a particular cryptocurrency wallet. For example, if Person A wants to provide Person B an address where Cryptocurrency should be sent, Person A will provide Person B their public key, which serves as a cryptocurrency wallet to which Person B will direct a transfer. In order to transfer cryptocurrency from a wallet to another the user must use their private key, which provides them control over the wallet.

<sup>19</sup> At the time of the search, wallets [Marketplace-1] 1, [Marketplace-1] 2, [Marketplace-1] 3, contained most proceeds, a total of approximately 1315.6 BTC (\$36.8 million) in deposits. The wallet identified as a [name of a cryptocurrency tracking software promoted by Administrator-1] contained approximately 0.41 BTC (\$11,921) in deposits.

ii. A review of BTC Bank Wallet-1 indicates that from on or about November 9, 2020 through on or about January 9, 2024, there were approximately 244,483 Bitcoin transactions in and out of BTC Bank Wallet-1, consisting of approximately 183,772 deposits and approximately 60,711 withdrawals. The total Bitcoin deposited represents approximately 1,316.038719 BTC (\$36,895,586.12), and the total Bitcoin withdrawn represents approximately 1,303.126267 BTC (\$36,431,574.05).<sup>20</sup>

iii. Server-3 also housed a Monero wallet ("XMR Bank Wallet-1"). Based on a review of XMR Bank Wallet-1, from on or about November 9, 2020, through on or about January 9, 2024, there were approximately 265,375 Monero transactions consisting of 181,918 deposits and 83,457 withdrawals. The total XMR deposited represents approximately 296,094 XMR (\$46,728,991), and the total Monero withdrawn represents approximately 294,634 XMR (\$46,482,976).

iv. Combining BTC Bank Wallet-1 and XMR Wallet-1—"Bank Wallet-1"—indicates that from its inception to on or about January 9, 2024, Marketplace-1 generated at least approximately \$83,624,577 in revenue, which yielded at least approximately \$4,181,228 from its 5% commission. A review of Bank Wallet-1 further indicates that Marketplace-1 activity increased year over year. For example, in 2022, Bank Wallet-1 received approximately \$14.8 million in deposits. In 2023, Bank Wallet-1 received approximately \$65.5 million in deposits.

c. Using software tools, law enforcement officers reviewed the publicly available Bitcoin digital ledger and traced transactions involving BTC Bank Wallet-1. In so doing, law enforcement officers identified a series of wallets that received the majority of funds from BTC Bank Wallet-1—*i.e.*, that received the proceeds of Marketplace-1. One such particular wallet—"Administrator Wallet-1"—received the most funds from Bank Wallet-1, over approximately 58 deposits from in or about October 2021 through in or about September 2023.

i. During that time period, of the approximately 58 deposits into Administrator Wallet-1 from BTC Bank Wallet-1, approximately 24 were whole value transfers (*e.g.* 1 BTC or 5 BTC as opposed to 1.789 BTC.) Based on my training and experience, the transfer of whole amounts is indicative of transferring proceeds (*i.e.* the proceeds derived from the 5% fee) from to an administrator as a profit. This is because when transferring funds, with the purpose of moving them, individuals tend use simple whole numbers. On the other hand, when transferring funds, with the purpose of purchasing items, the amounts tend to not be in whole numbers because prices of items are pegged to fiat currencies and cryptocurrency is highly volatile.

ii. Further, during that time period, the vast majority of Administrator Wallet-1's funds—approximately 123.14 BTC (\$3,351,343)—came from BTC Bank Wallet-1. That is, the cryptocurrency flowing into Administrator Wallet-1 is from Marketplace-1. After receiving Marketplace-1 cryptocurrency, Administrator Wallet-1 transferred it elsewhere. Specifically, from on or about March 25, 2020 through on or about October 1, 2023, Administrator Wallet-1 received approximately 77 deposits of Bitcoin, totaling approximately 126.0026 BTC, and then transferred all of it to other wallets.

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<sup>20</sup> Due to the volatility of cryptocurrencies, as to all United States Dollar converted amounts herein are approximate and based on the floating exchange rate near the time of the transaction.

iii. Accordingly, Administrator Wallet-1 appears to be a “pass through” wallet used to obscure the source of funds (which is Marketplace-1), while transferring the cryptocurrency to other wallets under the control of Administrator-1.

d. Administrator-1 Used “Swapping Service-1.”

i. On or about May 23, 2023 at approximately 12:07 UTC, Administrator-1 posted on Forum-1 that he “[g]ot fucked by [Swapping Service-1].”<sup>21</sup> The post further indicated, in substance and in part, that “approximately one hour ago, 1 BTC was sent to [Swapping Service-1] for hot wallet rebalancing. XMR didn’t come out on the other end, and turned out to be confiscated. Their support replied with: ‘We received word from our exchange partner that your crypto were obtained through illegal proceedings. Please provide proof of funds.’”

ii. On the day that Administrator-1 posted the comment about Swapping Service-1, *supra*, law enforcement officers observed on the Bitcoin public digital ledger a one (1) Bitcoin transfer from Administrator Wallet-1 to a particular wallet address associated with Swapping Service-1 (“Transaction-1”). Transaction-1 appears to be the transaction mentioned by Administrator-1 in the above post. Indeed, the time of Transaction-1, approximately 11:15 UTC, aligns with the timing of the transfer recounted by Administrator-1 who indicated in the post, which was posted at approximately 12:07 UTC, that the transfer occurred “an hour ago.”

e. Accordingly, I believe that Administrator Wallet-1 is controlled and managed by Administrator-1. I believe this because, *inter alia*: (i) Administrator Wallet-1 received the most money from Bank Wallet-1, which is the wallet used by Marketplace-1; (ii) Administrator Wallet-1 primarily received whole amounts of Bitcoin from Bank Wallet-1; and (iii) Administrator Wallet-1 was involved in Transaction-1, which is a transaction that Administrator-1 complained about in an online post on Forum-1.

**RUI-SIANG LIN is Administrator-1**

25. Based on my involvement in this investigation, my training and experience, my review of documents and other materials, as well as my conversations with law enforcement officers and others, I believe that RUI-SIANG LIN, a/k/a “林睿庠,” the defendant, is Administrator-1. Thus, LIN is the principal administrator of Marketplace-1 who manages its entire operations, leads the activities the other two administrators, ultimately decides whether any of the more than one thousand vendors can sell narcotics on Marketplace-1, promotes Marketplace-1, controls Bank Wallet-1, controls Administrator Wallet-1, and profits from Marketplace-1’s illegal operations. I believe this based on, among other things, the following:

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<sup>21</sup> Swapping Service-1 is a particular online cryptocurrency swapping service. A cryptocurrency swapping service allows its users to convert their cryptocurrency from one type of cryptocurrency to another for a fee. For example, users can “swap” their Bitcoin for Monero or vice versa. While it is possible such swapping could have a legitimate purpose, based on my training and experience, it is also a way individuals try to conceal the source of their funds to hide from law enforcement and others.

a. LIN Used Administrator Wallet-1 to Purchase an Internet Domain. As described below, Administrator Wallet-1 was used to purchase a domain registered to LIN.

i. Based on a review of the Bitcoin digital ledger, law enforcement officers learned that Administrator Wallet-1 conducted at least four transactions with Namecheap, an online domain registrar. In particular, Administrator Wallet-1 paid for, or partially paid for, at least four internet domains: (1) a domain which provides real-time status updates for popular darknet marketplaces and services, including Marketplace-1; (2) a domain which promoted a now defunct illegal darknet market; (3) a domain for a website associated with Marketplace-1—specifically a site that promotes the “[Marketplace-1] team,” contains a link to Marketplace-1, and the description that Marketplace-1 allows users to “[b]uy whatever you desire with the best security, friendly interface and streamlined user experience there is. Real free trade starts here.”; and (4) an additional particular domain (“Domain-1”).

ii. Specifically, based on Namecheap documents, “Domain-1” was purchased on or about March 25, 2022, by a particular Namecheap account (“Namecheap Account-1”) using funds from both Administrator Wallet-1 and a particular account hosted by a cryptocurrency digital marketplace (“Crypto Account-1”).<sup>22</sup> The total price of Domain-1 was approximately \$20,000—the vast majority of which was paid for from Crypto Account-1. But Administrator Wallet-1 also transferred approximately .00501 BTC (\$22.09) to Namecheap to complete the purchase of Domain-1.

iii. Namecheap Account-1 appears to be LIN’s Namecheap account. Namecheap Account-1 is registered to “RuiSiang Lin,” using a particular phone number with a Taiwanese country code (“Phone Number-1”), a physical address in Taipei, Taiwan, and a particular email address, which contains in its username the text “ruisiang” (“Lin Personal Email Account-1”).<sup>23</sup>

b. LIN’s Crypto Account-1 Received Marketplace-1 proceeds. As described below, Crypto Account-1 appears to have received substantial funds from Marketplace-1. Using software tools, law enforcement officers have reviewed the publicly available Bitcoin digital ledger, as well as the transaction history of Crypto Account-1, and learned the following, in substance and in part:

i. On or about July 26, 2021, at approximately 07:43 UTC, Administrator Wallet-1 transferred approximately .04 Bitcoin to a particular swapping service (“Swapping Service-2”) (approximate value at the time of transfer was \$1,528), where it was swapped for

<sup>22</sup> A cryptocurrency digital marketplace enables users to buy and sell cryptocurrencies. Users also maintain accounts with the marketplace where they can hold cryptocurrencies over time.

<sup>23</sup> On or about October 4, 2023, “RUISIANG LIN” with the alias “林睿庠” applied for a visa to enter the United States. In the application, LIN provided Phone Number-1 as his phone number and Lin Personal Email Account-1 as his email address. In the application, LIN described his employment duties as “RESEARCH AND DEVELOP BLOCKCHAIN APPLICATIONS AND BACKEND.” LIN’s application indicates he is from Taiwan and graduated National Taiwan University. Finally, LIN submitted a particular photograph of himself in connection with the visa application (“Photograph-1”).

approximately 6.7681 XMR. Approximately 21 minutes after the .04 Bitcoin transfer from Administrator Wallet-1, which was converted to 6.7681 XMR, Crypto Account-1 received a deposit of 6.7681 XMR (approximate value at the time of transfer was \$1,476).

ii. On or about May 15, 2022, at approximately 03:18 UTC, Administrator Wallet-1 transferred 1 Bitcoin to Swapping Service-1 (approximate value at the time of transfer was \$29,745), where it was swapped for approximately 193.68 XMR. Approximately 40 minutes after the 1 Bitcoin transfer from Administrator Wallet-1, which was converted to 193.68 XMR, Crypto Account-1 received a deposit of 180 XMR (approximate value at the time of transfer was \$30,978).

iii. On or about May 17, 2022, at approximately 09:59 UTC, Administrator Wallet-1 transferred 1 Bitcoin to Swapping Service-1 (approximate value at the time of transfer was \$30,571), where it was swapped for approximately 176.07 XMR. Approximately 27 minutes after the 1 Bitcoin transfer from Administrator Wallet-1, which was converted to 176.07 XMR, Crypto Account-1 received a deposit of 180 XMR (approximate value at the time of transfer was \$31,104).

iv. On or about May 31, 2022, at approximately 08:33 UTC, Administrator Wallet-1 transferred 2 Bitcoin to Swapping Service-1 (approximate value at the time of transfer was \$63,432), where it was swapped for approximately 304.74 XMR. Approximately 35 minutes after the 2 Bitcoin transfer from Administrator Wallet-1, which was converted to 304 XMR, Crypto Account-1 received a deposit of 300 XMR (approximate value at the time of transfer was \$59,580).

v. These transfers appear to indicate that the transferor used Swapping Service-1 to obscure the source of the money transferred from Administrator Wallet-1 to Crypto Account-1. That is, rather than transfer money from Administrator Wallet-1 directly to Crypto Account-1, cryptocurrency was first swapped through Swapping Service-1 and converted from Bitcoin to Monero, which is a cryptocurrency that is much more difficult to trace. After the swap, the funds were transferred into LIN's Crypto Account-1.

vi. Documents from the provider of Crypto Account-1 indicate that its user provided Phone Number-1 as his mobile number, Lin Personal Email Account-1 as his email address, and the below pictured Taiwanese Driver's License as proof of identity. The below Taiwanese Driver's License, with redactions applied over certain identifying information, lists an address in Taipei, Taiwan and the name is "林睿庠," which is the Mandarin language spelling of "Rui-Siang Lin." In addition, the Taiwanese Driver's License listed the driver's license number for "林睿庠," ("License Number-1").



vii. Accordingly, LIN appears to own and control Crypto Account-1, which has received Marketplace-1 proceeds.

c. LIN's Cryptocurrency Holdings Increased as Marketplace-1 Business Increased

i. As indicated in the chart above, *supra* ¶ 22.i, a review of Bank Wallet-1 and the “orders” in Server-2 reveals that Marketplace-1 business increased from 2021 to 2023. While Marketplace-1 grew from 2021 to 2023, LIN's cryptocurrency holdings also increased. Monero deposits into Crypto Account-1 increased in a similar pattern from 2021 (approximately \$63,154 deposited) to 2022 (approximately \$1,302,946 deposited) to 2023 (approximately \$4,196,408 deposited). Bitcoin deposits into Crypto Account-1 also increased from 2021 (approximately \$1,195 deposited) to 2022 (approximately \$37,784 deposited) to 2023 (approximately \$1,792,096 deposited).

ii. Law enforcement also identified another cryptocurrency exchange account (“Crypto Account-2”) registered to the name “Rui-Siang Lin,” using Lin Personal Email Account-1 and Phone Number-1. Crypto Account-2 was created on or about July 25, 2023 and from that date to on or about November 21, 2023, it received approximately \$4.5 million dollars of crypto currency deposits.

iii. Based on a review of Lin Personal Email Account-1,<sup>24</sup> law enforcement officers located a copy of LIN's resume from in or about November 2023. Based on that resume, LIN's employment history is not consistent with the large amount of assets in his cryptocurrency accounts. That is, LIN's past employment does not appear to be the sort of employment for which an individual would have been paid or otherwise obtained millions of dollars. Of the four listed “professional experience[s]” in LIN's resume, the first position is an “intern,” the second is a “student researcher,” the third is a “co-founder” of an obscure tech company, and the fourth is an “information technology” employee for a foreign-government office. None of these positions suggest that LIN would have earned millions of dollars. Accordingly, I believe that the large volume of assets in LIN's cryptocurrency accounts are the result of his work as Administrator-1.

<sup>24</sup> On or about November 22, 2023, law enforcement officers obtained a judicially authorized search warrant on Lin Personal Email Account-1.

d. LIN Has the Required Technical Knowledge. Based on publicly available information, LIN appears to have the requisite technical knowledge and experience to operate and manage a complex darknet market such as Marketplace-1.

i. Law enforcement officers identified a particular GitHub account, which is registered to Lin Personal Email Account-1.<sup>25</sup> The name associated with this GitHub account is “Ruisiang.” Accordingly, it appears to be LIN’s GitHub account. In LIN’s GitHub account, LIN describes himself as a “Backend and Blockchain Engineer, Monero Enthusiast.” LIN’s GitHub account has approximately 35 publicly available software coding projects. Collectively, these coding projects indicate that LIN has significant technical computing knowledge, including knowledge necessary to administer a site like Marketplace-1. The coding projects include operation of cryptocurrency servers and web applications—such coding knowledge is necessary to administer Marketplace-1. LIN’s GitHub account includes, for example, the following coding projects:

1. “PoW Shield,” which is a tool to mitigate DDoS attacks. Notably, as mentioned above, Marketplace-1 has trumpeted its ability to deflect DDoS attacks and implements Server-1 for that purpose. (*See supra* ¶¶ 21.a, 23.i.v.)

2. “Monero Merchant,” which is a software tool that allows online merchants to accept XMR for payment.

3. “Koa-typescript-framework,” which is a webframe software program used as a foundation for web applications. Marketplace-1 is built on Koa and Typescript.

e. LIN’s YouTube Interview. Law enforcement officers have identified a particular publicly available YouTube video (“Video-1”). Video-1 contains an approximately 15-minute interview with LIN regarding “PoW Shield.” During the interview, LIN explained that there are various methods to stop a DDoS attack, including by increasing bandwidth and setting up “edge servers.” Specifically, during the interview “Ruisang” describes, in English, software designed to disrupt DDoS attacks. The interview contains an “About Me” title page in which “Ruisang” is identified as “Lin, RuiSiang,” “Backend & Blockchain Dev,” Undergraduate at National Taiwan University,” “Crypto Enthusiast,” along with a link to LIN’s GitHub account. The individual interviewed appears to be the same individual pictured in the Taiwanese Driver’s License, *supra* ¶ 25.b.vi, and is identified with the mandarin language name for “Rui-Siang Lin,” as pictured below:

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<sup>25</sup> GitHub is a social media platform that allows software developers to create, store, and manage software codes. Users can post software code on the site and/or communicate with others about software-based issues.



f. LIN's Personal Email Account-1 Demonstrates LIN is Administrator-1:

i. Lin Personal Email Account-1 is LIN's email account. Lin Personal Email Account-1 is registered to the name “林睿庠,” which is the same name on the Taiwanese Driver's License used to register Crypto Account-1 and the name used in Video-1. Lin Personal Email Account-1 is also registered to Phone Number-1, which is the same phone number associated with Crypto Account-1. Based on a review of the content in Lin Personal Email Account-1, it appears to be LIN's personal email account. For example:

1. On or about May 4, 2022, Lin Personal Email Account-1 sent an email in response to a job post, which read, in substance and in part: “My name is RuiSiang Lin, and I'm currently a third year at National Taiwan University. I've developed blockchain and backend applications for 2.5 years now as an intern at [redacted]. Also, I've had a solid infrastructure and cybersecurity background.” Attached to the email was LIN's English language resume which listed Phone Number-1 as LIN's phone number and Lin Personal Email Account-1 as LIN's email address. The resume listed various computer coding experience including links to LIN's GitHub account.

2. On or about November 22, 2023, Lin Personal Email Account-1 received an email from a particular Taiwanese Bank. Attached to that email was a bank statement, which was password protected. The email from the bank indicated, in substance and in part and based on machine translations, that the password to decrypt the bank statements was LIN's identification number. Law enforcement officers were able to decrypt the bank statement by using License Number-1. The bank statement indicated that LIN had over \$1 million in his accounts.

ii. Lin Personal Email Account-1 Searches Coincide with Administrator-1 Activities. As described above, law enforcement officers obtained a search warrant on Lin Personal Email Account-1, which provided law enforcement officers access to the content of that account including, among other things, the Google searches that the user of Lin Personal Email Account-1 ran, and learned as follows:

1. *Pixel Attacks*

a. On or about May 7, 2021 at 08:51 UTC, the user of Lin Personal Email Account-1 searched Google for “one pixel attack for fooling deep neural networks github.” Thereafter, according to documents obtained from Google, Lin visited a particular url on GitHub (“GitHub URL-1”).

b. On or about May 7, 2021 at 18:40 UTC, Administrator-1 posted on Forum-1 a post titled “A Proposal for ML-proof improvement on DeCaptcha” within that post, Administrator-1 wrote, in substance and in part, “One pixel attacks should deem the spammers/DDoSers ML efforts to fail.” The post provided GitHub URL-1 as a link for further reading on the topic—*i.e.*, the same link Lin Personal Email Account-1 visited earlier that day.

2. *Marketplace-1 Casino*

a. On or about September 2, 2021, the user of Lin Personal Email Account-1 searched Google for “provable fair calculator.” On September 3, 2021, the user of Lin Personal Email Account-1 searched Google for “slot game terminology.” On or about September 4, 2021, the user of Lin Personal Email Account-1 performed several searches that appear to be related to animating dice rolling using a particular software coding language. On or about September 5, 2021, the user of Lin Personal Email Account-1 performed several internet searches regarding playing cards, poker, and blackjack. On or about September 7, 2021, the user of Lin Personal Email Account-1 performed several searches regarding animating card flips and blackjack mathematics.

b. On or about September 7, 2021, the Marketplace-1 “Changelog” lists the following changes to Marketplace-1 “Integrated online casino [Marketplace-1 nickname]bets.”<sup>26</sup>

c. On or about September 15, 2021, Administrator-1 posted on Forum-1, in substance and in part, that Marketplace-1 offers “[Marketplace-1 nickname]bets.” The post contains the phrase “provably fair mechanism”—*i.e.*, a phrase similar to what LIN searched thirteen days earlier.

3. *Three-Way Chat Feature*

a. On or about September 19, 2021, the user of Lin Personal Email Account-1 searched Google for “three-way conversation.”

b. On or about September 20, 2021, Administrator-1 posted on Forum-1, in substance and in part, that Marketplace-1 now offers a redesigned dispute system with “per-order three-way chats.”

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<sup>26</sup> The Marketplace-1 “Changelog” is a running list of changes made to Marketplace-1. Those changes typically indicate software updates, bug fixes, and adding features to the site.

#### 4. *Cryptopunk Generator*

a. On or about February 7, 2022, the user of Lin Personal Email Account-1 searched Google for “cryptopunk generator js,” “array.reduce,” “get random in array,” and “js random true false.”

b. On or about February 28, 2022, the Marketplace-1 “Changelog” lists the following changes to Marketplace-1: “Added punk avatars, unique generated icons that represent you.” Similarly, as indicated above, on or about March 1, 2022, Adminstrator-1 posted that Marketplace-1 “[a]dded punk avatars: randomly generated icons that represent you” on Forum-1.

c. Based on my training and experience, the search “cryptopunk” was performed to locate images of a popular internet NFTs and memes. Those images were then used to create Marketplace-1 avatars. The other February 7, 2022 searches appear to be related to randomizing functions, thus enabling Marketplace-1 to randomly, and uniquely, assign a “cryptopunk” avatar to each user.

#### 5. *Troubleshooting an Offline Server*

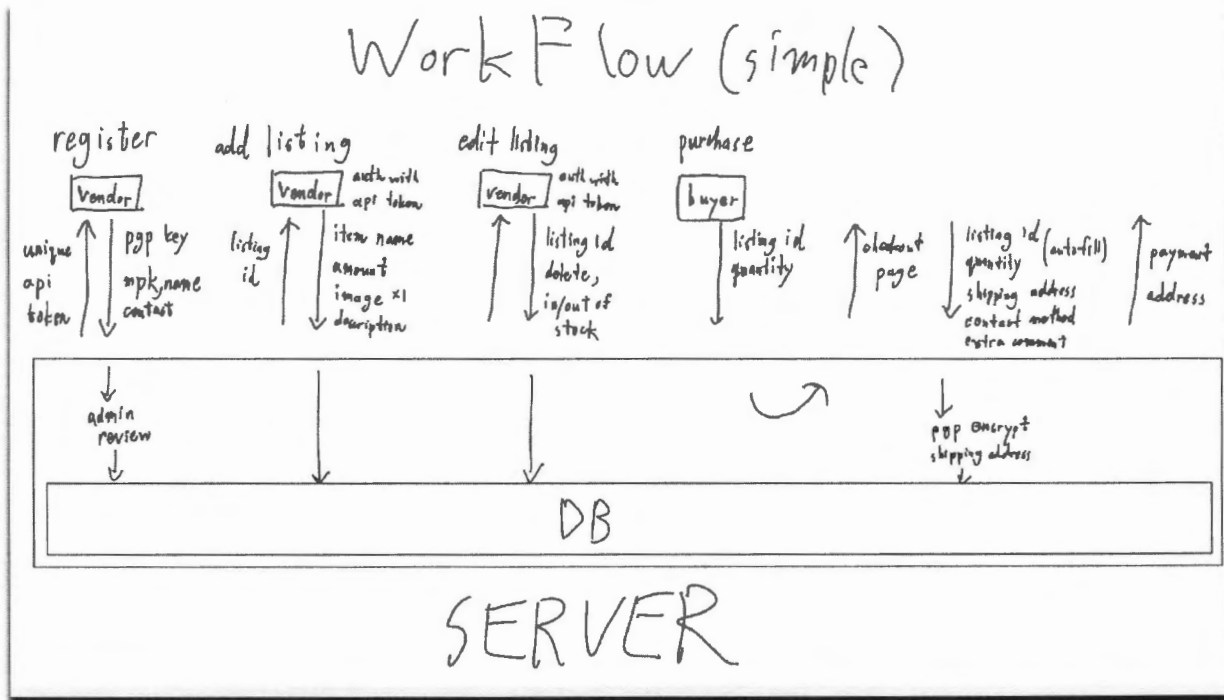
a. On or about July 19, 2022, pursuant to a judicially authorized warrant, the FBI imaged a server, which hosted Marketplace-1. To execute that search warrant, the FBI took the Marketplace-1 sever offline at approximately 23:30 UTC.

b. On or about July 20, 2022, at approximately 00:18 UTC, 00:19 UTC, 00:20 UTC, and 00:23 UTC, the user of the Lin Personal Email Account-1 searched Google for “pm2 crashed,” “view pm2 daemon logs,” “pm2 daemon logs,” and “pm2 changelog,” respectively.

c. Based on my training and experience, I have learned that “PM2” is process manager software which helps its users manage and maintain applications online. Thus, these July 20, 2022 searches—which were performed less than an hour after Marketplace-1’s server went offline—appear to be LIN attempting to troubleshoot the fact that a Marketplace-1 server went offline.

iii. LIN Emailed Himself a Diagram of a Darknet Marketplace

1. On or about March 12, 2020, the user of Lin Personal Email Account-1 emailed himself a diagram, which is pictured below.



b. This diagram appears to be a plan for a darknet market. Notably, the diagram indicated “vendor,” “listing,” “pgp key,” and “admin review,” all of which are features of Marketplace-1.

c. In addition to the above mentioned Google searches performed by the user of Lin Personal Email Account-1, this diagram is further evidence that LIN is Administrator-1.

**Surveillance of LIN Matches His Activities on Lin Personal Email Account-1**

26. Based on my involvement in this investigation, my training and experience, my review of documents and other materials, as well as my conversations with law enforcement officers and others, I have learned that:

a. On or about October 25, 2023, the user of Lin Personal Email Account-1 searched for, among other things, “What to Pack for Your Trip to St. Lucia (2023).”

b. On or about November 2, 2023, the user of Lin Personal Email Account-1 searched for, among other things, “Online Check in - EVA Air | Global (English).”<sup>27</sup>

<sup>27</sup> EVA is a Taiwanese airline.

c. The next day, the user of Lin Personal Email Account-1 searched for, among other things, “pearson toronto american express,”<sup>28</sup> “pearson priority security lane,” “toronto airport priority pass,” “toronto midnight bars,” and “Harbor Club St. Lucia.”

d. On or about November 3, 2023, law enforcement officers observed a man who appeared to be the same individual in Photograph-1, Video-1, as well as the individual depicted in the Taiwanese Driver’s License photograph described above—*i.e.* RUI-SIANG LIN, a/k/a “林睿庠,” the defendant—walk through international customs at Toronto Pearson Airport in Canada, which indicates that LIN had arrived on an inbound international flight. LIN was next observed at a baggage terminal. The officers then surveilled LIN leave the airport in a rideshare car and arrive at a nearby hotel. The next day, law enforcement officers observed LIN in Pearson Airport board a plane destined for St. Lucia. That is, consistent with the aforementioned Google searches, LIN spent an evening in Toronto, and after doing so traveled to St. Lucia.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of RUI-SIANG LIN, a/k/a “林睿庠,” the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

/s authorized electronic signature

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Mark Rubins  
Task Force Officer  
Federal Bureau of Investigation

Sworn to me through the transmission of  
this Complaint by reliable electronic  
means (telephone), this 26<sup>th</sup> day of January, 2024.



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THE HONORABLE SARAH NETBURN  
United States Magistrate Judge  
Southern District of New York

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<sup>28</sup> Toronto Pearson International Airport is an international airport located in Toronto, Canada.